

Arjun Vasan
12615 193rd Street
Cerritos, CA 90703 (562)
900-6541
arjun.vasan@gmail.com
Plaintiff Pro Se

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X

CHECKMATE.COM, INC.,
Plaintiff,

Case No: **1:25-cv-03181-JMF**

-against-

(Originally Filed in the Supreme
Court of the State of New York,
County of New York)

ARJUN VASAN,
Defendant.

-----X

**DEFENDANT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO
COMPLAINT**

TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK:

Defendant Arjun Vasan, appearing pro se, respectfully moves this Court for an extension of time to respond to the Complaint pursuant to Federal Rule of Civil Procedure 6(b)(1)(B), and states the following:

1. This action was removed from New York state court to this Court by Defendant via pro se email submission on April 12, 2025.
2. The Notice of Removal was not accepted and docketed by the Clerk of Court until April 17, 2025.
3. Pursuant to Federal Rule of Civil Procedure 81(c)(2), Defendant understands the deadline to respond runs from the date of docketing.
4. However, out of an abundance of caution and in the event the Court considers April 12 the operative filing date, Defendant files this motion within the potential 7-day response window under Rule 81(c)(2)(C).
5. Defendant is currently prosecuting a related civil matter as a pro se plaintiff in the Central District of California and managing both cases without legal counsel.
6. Due to the complexity of the litigation and a good-faith miscalculation of the response deadline, Defendant respectfully requests a brief extension of 14 days, through and including **May 3, 2025**, to file a responsive pleading.
7. This request is made in good faith and not for the purpose of delay. No party will be prejudiced by the requested extension.

Dated: **April 19, 2025**

In: **Cerritos, California**

Respectfully submitted,

By: */s/ Arjun Vasan*

Arjun Vasan

Defendant, Pro Se

[PROPOSED] ORDER

Upon consideration of Defendant Arjun Vasan's Motion for Extension of Time to Respond to the Complaint, and for good cause shown, it is hereby:

ORDERED that the Motion is GRANTED.

Defendant shall file a responsive pleading on or before **May 3, 2025**.

SO ORDERED.

Dated: _____

New York, New York